

Amy J. Oliver (8785)
olivera@sec.gov
Daniel J. Wadley (10358)
wadleyd@sec.gov
Attorneys for Plaintiff
Securities and Exchange Commission
351 South West Temple, Suite 6.100
Salt Lake City, Utah 84101
Tel. 801-524-5796

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

PLAINTIFF,

v.

JERSEY CONSULTING LLC, a Nevada
limited liability company, MARC ANDREW
TAGER, an individual, MATTHEW EARL
MANGUM, an individual, SUZANNE
AILEEN GAGNIER, an individual, KENNETH
STEPHEN GROSS, an individual, JEFFREY
ROWLAND LEBARTON, an individual,
JONATHAN EDWARD SHOUCAIR, an
individual, EDWARD DEAN GOSS, an
individual, DANA KENTON HARRLOE, an
individual, and NICHOLI MANDRACKEN, an
individual,

DEFENDANTS; and

PREMIER MARKETING SOLUTIONS, INC.,
a California corporation, EQUITY FIRST
PROPERTIES INC., a California corporation,
EEE MEDIA, INC., a California corporation,
XYZ LEADS, INC., a Wyoming corporation, U
TURN MARKETING, INC., a Florida
corporation, MATTHEW JACOB FREITAS, an
individual, ROXANE MARIE GROSS, an
individual, and CHRISTINE L. SHOUCAIR, an
individual,

RELIEF DEFENDANTS.

**NOTICE OF VOLUNTARY
DISMISSAL OF DEFENDANT
DANA KENTON HARRLOE
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 41(a)(1)**

Case No.: 2:18-cv-00155

Judge: Bruce S. Jenkins

Plaintiff Securities and Exchange Commission (the “Commission”) hereby voluntarily dismisses its complaint against Defendant Dana Kenton Harrloe pursuant to Federal Rule of Civil Procedure 41(a)(1).

On August 14, 2018, the Commission filed an Amended Complaint in this case naming Dana Kenton Harrloe, among others, as a defendant. Docket No. 102. On September 5, 2018, the Commission filed a Notice of Death of Defendants Lebarton and Harrloe. Docket No. 119. Ms. Harrloe had not answered or otherwise responded to the Complaint nor did she file a motion for summary judgment.

Therefore, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), the Commission provides this notice that it is voluntarily dismissing its complaint against Defendant Dana Kenton Harrloe.

Dated October 25, 2018.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Amy J. Oliver", is written over a light blue rectangular background.

Amy J. Oliver
Daniel J. Wadley
Attorneys for Plaintiff
Securities and Exchange Commission

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of October, 2018, I served true and correct copy of the foregoing **NOTICE OF VOLUNTARY DISMISSAL OF DEFENDANT DANA KENTON HARRLOE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a) (1)** via the method indicated below upon the following:

<p>Marc A. Tager Weber County Jail 721 W. 12th Street Ogden, UT 84404 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Defendant</i></p>	<p>Brent R. Baker Neil A. Kaplan Shannon K. Zollinger Clyde Snow & Sessions, PC 201 S. Main Street, Suite 1300 Salt Lake City, UT 84111 VIA CM/ECF brb@clydesnow.com nak@clydesnow.com skz@clydesnow.com</p> <p><i>Counsel to Defendant Suzanne A. Gagnier and Premier Marketing Solutions, Inc.</i></p>
<p>Kenneth S. Gross 12066 Eddleston Drive Northridge, CA 91326 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Defendant</i></p>	<p>Patrick S. Boice Boice Law, LLC VIA CM/ECF patrick@boice-law.com Scott Vick Vick Law Group, APC VIA CM/ECF scott@vicklawgroup.com</p> <p><i>Counsel to Defendant Jeffrey R. Lebarton</i></p>
<p>Jonathan E. Shoucair 10036 Forbes Avenue North Hills, CA 91343-1002 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Defendant</i></p>	<p>Sean N. Egan South Temple Tower Ste 1505 136 E South Temple Salt Lake City, UT 84111-1139 VIA CM/ECF seannegan@sneganlaw.com</p> <p><i>Counsel to Relief Defendant Matthew Freitas</i></p>
<p>R. Blake Hamilton Ashley M. Gregson DURHAM JONES & PINEGAR, P.C. VIA CM/ECF bhamilton@djplaw.com agregson@djplaw.com</p> <p><i>Counsel to Defendant Matthew E. Mangum</i></p>	<p>Christine L. Shoucair 10036 Forbes Ave North Hills, CA 91343 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Relief Defendant</i></p>
<p>Equity First Properties 1507 7th Street #549 Santa Monica, CA 90401 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Relief Defendant</i></p>	<p>Jersey Consulting LLC c/o Marc A. Tager Weber County Jail 721 W. 12th Street Ogden, UT 84404 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Defendant</i></p>

<p>Roxane Marie Gross 12066 Eddleston Drive Northridge, CA 91326 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Relief Defendant</i></p>	<p>XYZ Leads, Inc. c/o Wyoming Registered Agent 1621 Central Avenue Cheyenne, WY 82001 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Relief Defendant</i></p>
<p>Nicholi Mandracken 21986 Lyons Valley Road Alpine, CA 91901 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Defendant</i></p>	<p>U Turn Marketing, Inc. c/o Nicholi Mandracken 21986 Lyons Valley Road Alpine, CA 91901 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Relief Defendant</i></p>
<p>EEE Media Inc. c/o Edward D. Goss 1718 Cleveland Road Glendale, CA 91202-1012 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Relief Defendant</i></p>	<p>Edward D. Goss 1718 Cleveland Road Glendale, CA 91202-1012 VIA FIRST CLASS MAIL</p> <p><i>Pro Se Defendant</i></p>

Amy J. Oliver